

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIA ASH,

Defendant.

Case No. 1:19-cr-00780-LAK

**PROPOSED *VOIR DIRE* QUESTIONS ON BEHALF OF
DEFENDANT SYLVIA G. ASH**

Dated: New York, New York
November 9, 2021

MORRISON & FOERSTER LLP

By: /s/ Carrie H. Cohen
Carrie H. Cohen
Nathan D. Reilly
Janie C. Buckley
250 West 55th Street
New York, NY 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Email: CCohen@mofo.com
NReilly@mofo.com
JBuckley@mofo.com

Counsel for Defendant Sylvia Ash

PROPOSED VOIR DIRE QUESTIONS

Pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, Ms. Ash respectfully requests that the Court include the following questions in its oral *voir dire* of prospective jurors.

- Do you think that the fact that an individual has been charged with a crime means that the person is probably guilty?
- Do you believe that the government never, or only very rarely, prosecutes individuals who are innocent?
- Do you believe that a defendant in a criminal trial should be required to produce evidence to prove that she is not guilty of the crimes with which she is charged?
- Do you believe that if a defendant in a criminal trial does not testify then the defendant is probably guilty?
- Do you believe that if evidence tended to show that a defendant had not been truthful about one area of her life, it means that she is probably guilty?
- Have you ever served as a juror? On what type of case? Is there anything about that experience that will make it difficult for you to render a fair and impartial verdict in this case?
- Have you or someone in your immediate family ever been the party to a civil law suit, either a plaintiff or a defendant?
 - If yes, do you remember the name of the court where the suit was heard?
 - Is there anything about that experience that will make it difficult for you to render a fair and impartial verdict in this case?
- Will you be able to follow the Court's instruction that you are not to research anything related to this case on Google or any other internet search engine?

- Will you be also able to follow the Court's instruction that you are not permitted to discuss the case in any manner whatsoever, including on the internet and social media (such as Facebook, Twitter, blogs, etc.)?
- Are you a member of or do you use the services of a credit union?
- Have you ever served on the Board of Directors of any company or charity?
- What neighborhood or town do you live in? How long have you lived there? Where did you live previously?
- Are you employed? If so, what type of work do you do? (If you are retired, what type of work did you retire from?)
- If you reside with others, what type of work do they do? If you have adult children, how are they employed?
- What newspapers and magazines do you subscribe to or read? How frequently do you read them?
- What websites or blogs do you most regularly visit, and how often?
- What television stations do you watch, and how often?
- How do you spend your free time?
- Do you have any close friends or relatives who work in law enforcement?
- Do you have any close friends or relatives who work in the New York State court system?
- Are you acquainted with any of the following attorneys who will be representing the defendant in this case: (a) Carrie H. Cohen; (b) Nathan Reilly; (c) Janie Buckley? Do you know the paralegal who is assisting those attorneys Ashley Stephenson? Are you

acquainted with the law firm with which these attorneys are affiliated, Morrison &
Foerster LLP?

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Counsel for Defendant Sylvia Ash